

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**AGREED MOTION TO EXTEND TIME TO FILE AN
OBJECTION TO THE ADDITIONAL TORT CLAIMANTS COMMITTEE OF
SEXUAL ABUSE SURVIVORS' MOTION FOR AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 DIRECTING PRODUCTION OF DOCUMENTS
AND MATERIALS FROM THE UNITED STATES OLYMPIC COMMITTEE**

The Additional Tort Claimants Committee of Sexual Abuse Survivors (the “Sexual Abuse Survivors’ Committee”), appointed in this case under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), hereby submits this agreed motion for entry of an order extending the objection deadline on *The Additional Tort Claimants Committee of Sexual Abuse Survivors’ Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* (the “2004 Exam Motion”) [Doc 433] on the following grounds:

1. On April 26, 2019, the Sexual Abuse Survivors’ Committee filed the 2004 Exam Motion requesting entry of an order authorizing the Sexual Abuse Survivors’ Committee to issue a subpoena (the “Subpoena”), pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, to the United States Olympic Committee (the “USOC”) compelling the production of the documents as set forth in the Subpoena.

¹The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

2. The 2004 Exam Motion is currently set for hearing on May 15, 2019 at 1:30 p.m. (prevailing Eastern time) and the objection deadline is no later than 9:00 a.m. (prevailing Eastern time) on May 13, 2019. *See Order Granting Motion to Shorten Notice on the Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* [Doc 437].

3. Counsel for both the Sexual Abuse Survivors' Committee and the USOC have discussed the requested production and need additional time to confer whether an agreement can be reached as to the requested production. Accordingly, the Sexual Abuse Survivors' Committee requests an extension of the objection deadline for the 2004 Exam Motion for only the USOC to 4:00 p.m. (prevailing Eastern time) on May 30, 2019. The Sexual Abuse Survivors' Committee is also contemporaneously filing herewith a motion to continue the hearing on the 2004 Exam Motion to June 3, 2019 at 1:30 p.m. (prevailing Eastern time) or to a date and time as reasonably soon thereafter that the Court can reschedule the matter on its calendar.

4. James I. Stang, counsel for the Sexual Abuse Survivors' Committee, has discussed this motion and the motion to continue the hearing with Dianne F. Coffino, counsel for the USOC, and she has no objections to the requested extension or continuance.

WHEREFORE, the Sexual Abuse Survivors' Committee respectfully requests entry of an order, (i) extending the objection deadline on the 2004 Exam Motion for only the USOC to May 30, 2019 at 4:00 p.m. (prevailing Eastern time), and (ii) granting such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

Dated: May 13, 2019

/s/ James I. Stang

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Counsel for the Sexual Abuse Survivors' Committee

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019, a copy of the foregoing *Agreed Motion to Extend Time to File an Objection to The Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on May 13, 2019, a copy of the foregoing *Agreed Motion to Extend Time to File an Objection to The Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was served via electronic mail to the following:

United States Olympic Committee: Chris McCleary at Chris.McCleary@usoc.org
The Alexander, a Dolce Hotel and Wyndham Hotel Group, LLC: Daniel M. Eliades at daniel.eliades@klgates.com and David S. Catuogno at david.catuogno@klgates.com

/s/ Meredith R. Theisen

Meredith R. Theisen

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